Claims 1-22, all the claims pending in the application, stand rejected on prior art grounds. Applicants respectfully traverse these rejections based on the following discussion.

I.   **The Prior Art Rejections**

Claims 1-22 stand rejected under 35 U.S.C. §102(e) as being anticipated by Kushler, et al. (U.S. Publication No. 2004/0140956 A1), hereinafter referred to as Kushler. Applicants respectfully traverse these rejections based on the following discussion.

The claimed invention provides a system and method for relaxing typing accuracy in stylus or other keyboards. The method comprises recording a coordinate of a keystroke landing point, wherein the keystroke emanates from *tapping a key on a keyboard*, and *counting the number of tapped landing points*. Next, the method creates a set of words from a lexicon having the same amount of the tapped landing points; and, for each letter in each word in the set, computing the distance from the pattern formed by the landing coordinate to the pattern formed by the letters in words in a database. Moreover, the method selects a word from the set having the shortest total distance, wherein the distance is a mean distance of all the tapped landing points for each word, or wherein the distance is an elastic matching distance between the tapped landing points and the coordinate.

In the rejection, the Office Action argues that Kushler discloses many features of the claimed invention. However, Kushler fails to disclose inputting text by tapping individual keys on a keyboard, counting the number of keystroke landing points, and determining the word based on the number of keystroke landing points. Instead, Kushler discloses inputting text by *continuously* sliding a finger or pen over a "touch-sensitive screen". Therefore, as explained in greater detail below, Applicants respectfully submit that the prior art of record does not teach or suggest the claimed invention.

Applicants traverse the rejections because there is a fundamental difference between the claimed invention and Kushler. In Kushler, the text is input via *continuously* sliding a finger or pen over a "touch-sensitive screen". To the contrary, the claimed invention inputs text by tapping individual keys on a keyboard, counting the number of keystroke landing points, and determining the word based on the number of keystroke landing points.

Kushler requires a complex method of tracing out the path of points contacted on a complex "touch-screen controller hardware". Conversely, the claimed invention only has to count the number of tapped keys on a simple keyboard.

More specifically, as described in paragraph 0012 of Applicants' disclosure, the invention provides a method of relaxing typing accuracy comprising recording a coordinate of at least one keystroke landing point, wherein the keystroke emanates from tapping a key on a keyboard, counting an amount of tapped landing points, creating a set of words from a lexicon having a same number of the tapped landing points, for each letter in each word in the set, computing a distance from the coordinate to a central

position of the key corresponding to the letter, summing a total distance for each word, and selecting a word from the set having a shortest total distance to the coordinate, wherein the distance is a mean distance of all the tapped landing points for each word, or wherein the distance is an elastic matching distance between the tapped landing points and the coordinate. The method further comprises normalizing the elastic matching distance by an amount of letters in the word, and comparing the shortest total distance to a predetermined threshold distance. Furthermore, the invention outputs the word if the shortest total distance is smaller than the predetermined threshold distance, and outputs the letters tapped if the shortest total distance is greater than the predetermined threshold distance.

Accordingly, Applicants submit that Kushler fails to disclose inputting text by tapping individual keys on a keyboard, counting the number of keystroke landing points, and determining the word based on the number of keystroke landing points. Instead, Kushler discloses inputting text by ***continuously*** sliding a finger or pen over a "touch-sensitive screen".

Therefore, it is Applicants' position that the prior art of record fails to teach the claimed features of "recording a coordinate of a keystroke landing point corresponding to a sequence of tapped keys on said computer keyboard … [and] counting a total number of keystroke landing points tapped" as defined by independent claims 1 and 22. In addition, it is Applicants' position that the prior art of record fails to teach the claimed features of "recording a coordinate of at least one keystroke landing point, wherein said keystroke landing point emanates from tapping a key on a keyboard; [and] counting a

total amount of tapped keystroke landing points" as defined by independent claim 8 and "a recorder configured to record a coordinate of a keystroke landing point corresponding to a sequence of tapped keys on said computer keyboard; [and] a counter configured to count a total number of keystroke landing points tapped" as defined by independent claim 15.

Therefore, it is Applicants' position that the prior art of record does not teach or suggest many features defined by independent claims 1, 8, 15, and 22 and that such claims are patentable over the prior art of record. Further, it is Applicants' position that dependent claims 2-7, 9-14, and 16-21 are similarly patentable, not only because of their dependency from a patentable independent claims, but also because of the additional features of the invention they defined. In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw the rejections.

II.   Formal Matters and Conclusion

In view of the foregoing, Applicants submit that claims 1-22, all the claims presently pending in the application, are patentably distinct from the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary. Please charge any deficiencies and credit any overpayments to Attorney's Deposit Account Number 09-0441.

Respectfully submitted,

Dated: August 3, 2007

/Duane N. Moore/
Duane N. Moore
Registration No. 53,352

Gibb & Rahman, LLC
2568-A Riva Road, Suite 304
Annapolis, MD 21401
Voice: (410) 573-6501
Fax: (301) 261-8825
Customer Number: 29154